

# Attachment Two

Follow Up and Specific Request for  
Discovery

**From:** Anderson, Matthew (USAOKW) Matthew.Anderson2@usdoj.gov  
**Subject:** RE: [EXTERNAL] Bills - Missing Discovery  
**Date:** March 11, 2024 at 9:23 AM  
**To:** Robert Gifford robert.gifford@giffordlawyer.com

MA

I will have to see what is available.

Best,

Matt

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**From:** Robert Gifford <robert.gifford@giffordlawyer.com>  
**Sent:** Saturday, March 9, 2024 5:56 PM  
**To:** Anderson, Matthew (USAOKW) <MAAnderson2@usa.doj.gov>  
**Subject:** [EXTERNAL] Bills - Missing Discovery

Matt: I am looking for a few things that I don't think are included in the discovery.

1. Any dashcam or BWC video of the traffic stop, as well as when the agent took the car and drove it away to do another dog sniff at a different location.
2. The radio logs of the traffic stop and drug dog being called out.
3. Any information or report on when the drug dog was called out and actually arrived and was deployed the first time and the timing on the second time when they moved the car and re-deployed the drug dog.
4. Any information on the drug dog itself (e.g. OHP Utilization Report that tracks the drug dog's performance demonstrating his "find" rate and "false response" rate (or other documentation reflecting the same). If this isn't an OHP dog, then the equivalent for whichever agency's dog that it is.
5. Any documents used for the purposes of booking Ms. Bills into Cleveland County, the PC affidavit provided to the jail, and release from Cleveland County.

Thank you.

Robert D. Gifford  
ATTORNEY



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